

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, INC.,)
and TRUE THE VOTE,)
)
)
 Plaintiffs,) Case No. 1:12-cv-800-WTL-TAB
 v.)
)
)
J. BRADLEY KING, *et al.*)
)
)
 Defendants.)
)
)

**CONSENT MOTION FOR EXTENSION OF TIME TO MAKE EXPERT
DISCLOSURES AND FILE EXPERT REPORT**

Plaintiffs Judicial Watch and True the Vote, through undersigned counsel, hereby request a brief extension of fifteen (15) days to June 26, 2013 to make their expert witness disclosures and file their expert report with this Court pursuant to Fed. R. Civ. P. 26(a)(2). The current deadline is June 11, 2013. In support of this Motion, the following is respectfully shown:

1. On November 1, 2012, the parties to this case filed a Joint Case Management Plan (CMP) with the Court. ECF No. 32. That Joint CMP proposed a deadline of June 11, 2013 to “disclose the name, address, and vita of any expert witness, and shall serve the report required by Fed. R. Civ. P. 26(a)(2).” ECF No. 32 at 3.
2. On November 13, 2012, the Court issued a Case Management Plan Order stating that the parties Joint CMP was approved as submitted. ECF No. 33 at 1.
3. Undersigned counsel contacted Defendants’ counsel, Jefferson Garn, on April 17, 2013. Mr. Garn stated that he had no objection to the fifteen day extension of time to make the expert disclosures and submit the expert report.

4. While Plaintiffs have prosecuted this litigation with all reasonable haste, certain delays in scheduling the depositions of fact witnesses have necessitated this request for a brief extension of the expert deadlines. Plaintiffs' last currently-scheduled deposition of a Defendant witness is now set for May 30, 2013. Accordingly, grant of this Motion will ensure Plaintiffs' expert has ample time to review this deposition evidence prior to submission of the expert report.

In light of the foregoing, pursuant to S.D.Ind. L.R. 6.1(a), Plaintiffs' respectfully request the Court grant their Motion for a fifteen day extension of time to June 26, 2013 to make their expert witness disclosures and file their expert report.

Dated: April 19, 2013

Respectfully submitted,

/s/ Chris Fedeli

Chris Fedeli
Admitted Pro Hac Vice

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of April, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Chris Fedeli

Chris Fedeli